

*KIRTON LAW FIRM*

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October 12, 2021

VIA ELECTRONIC FILING

Honorable Paul G. Gardephe  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Alexei Saab, 19 cr. 676 (PGG)*

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. In August 2021, I filed a motion for a *Franks* hearing to address material omissions made by the Government in a search warrant application concerning Mr. Saab's seized electronic devices. The Government's memorandum in opposition to the motion included a classified *ex parte* supplement. I do not have security clearance, and I requested that the Court appoint cleared counsel to review the supplement for the Defense. The Court appointed CJA Attorney Deborah Colsen for this purpose. I request that the Court Order the Government to disclose its classified supplement to her so that she may assist the Defense in determining whether it needs a response.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton  
Marlon G. Kirton, Esq.

cc: Jason Richman, Assistant United States Attorney (via electronic mail)  
Jessica Fender, Assistant United States Attorney (via electronic mail)  
Esere Onadowan, Esq. (via electronic mail)

Deborah Colsen, Esq. (via electronic mail)